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**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

04-RCA-0019

OCT 30 2003

Mr. Allen W. Conklin, Supervisor  
Air Emissions and Defense Waste Section  
Washington State Department of Health  
P.O. Box 47827  
Olympia, Washington 98504

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**EDMC**

Dear Mr. Conklin:

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FEDERAL  
FACILITY COMPLIANCE AGREEMENT QUARTERLY STATUS REPORT FOR JULY  
THROUGH SEPTEMBER 2003**

Enclosed is the quarterly status report pursuant to the National Emission Standards for Hazardous Air Pollutants Federal Facility Compliance Agreement for the Hanford Site. This status report updates compliance activities that were in progress or completed during July through September 2003. If you have any questions, please call Mary Jarvis, of my staff, on (509) 376-2256.

Sincerely,

Joel Hebdon, Director  
Regulatory Compliance and Analysis Division

RCA:MFJ

Enclosure:

cc w/encl:

Ecology Library, Kennewick  
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R. H. Gurske, FHI  
N. A. Homan, FHI  
M. N. Jarayssi, CH2M  
R. Jim, YN

J. KenKnight, EPA  
P. C. Miller, CH2M  
R. Poeten, EPA  
P. Sobotta, NPT  
A. Valero, Ecology  
Admin Record  
Environmental Portal, LMSI

**HANFORD SITE NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR  
POLLUTANTS FEDERAL FACILITY COMPLIANCE AGREEMENT  
QUARTERLY STATUS REPORT FOR JULY THROUGH SEPTEMBER 2003**

On February 7, 1994, the U.S. Department of Energy, Richland Operations Office (RL), and the U. S. Environmental Protection Agency, Region 10 (EPA), entered into a Federal Facility Compliance Agreement (FFCA) pursuant to Executive Order 12088, October 13, 1978, (43 Federal Regulation 47707) and the Clean Air Act (CAA), as amended, 42 United States Congress 7401 et seq. to bring the Hanford Site into compliance with the CAA, specifically Title 40, Code of Federal Regulations, Part 61, "National Emission Standards for Hazardous Air Pollutants" (NESHAP). In accordance with Section V of the FFCA, this quarterly report provides a status on the progress made towards meeting the requirements described in the FFCA Compliance Plan.

**CURRENT QUARTER ACTIVITIES**

**FFCA Stack Closure Project**

**296-A-25:** The stack was deactivated and capped in October 2003. Paperwork closing this stack and downgrading it to a passive vent has yet to be submitted. Once the stack Report of Closure has been approved, the stack will be removed from Table 1.

**296-B-2 Passive Vent**

The vent is deactivated and capped. The stack Report of Closure was submitted to WDOH July 22, 2003, and has not yet been approved.

**296-Z-3**

The stack will be upgraded to a designated stack to support the decontamination and decommissioning activities of the 241-Z Tanks System and Building. The request for alternative stack flow measurement and sample extraction procedure was approved by the EPA on June 26, 2003. Upon WDOH's approval of the corresponding Notice of Construction, this stack will become a designated stack and will be added to Table 1.

**340 NT-EX Stack**

There has been no change in status on the downgrade of this stack; still waiting for approval on the NOC Report of Closure and on the modification to the AOP. Upon receipt of these two approvals, the stack will be formally downgraded and removed from Table 1.

## **DESIGNATED STACK STATUS**

Table 1, *Hanford Site Designated Stacks*, provides a current listing of NESHAP designated stacks and their compliance status.

## **FFCA COMPLIANCE PLAN MILESTONES STATUS**

Table 2, *Status of FFCA Compliance Plan Milestones*, provides the current status of FFCA Compliance Plan Milestones.

## **PLANNED ACTIVITIES**

Nothing to report.

**Table 1. Hanford Site Designated Stacks**

	Stack Number	Facility	Status
1	105-KW Air Sparger	105-KW Basin	In compliance
2	291-A-1	PUREX Plant	In compliance
3	296-A-25	244-A Lift Station Catch Tank	Is deactivated and capped
4	296-A-42	241-AY and AZ Tank Farms Primary Exhaust	In compliance
5	296-B-1	B Plant Main Stack	In compliance
6	296-B-2	B Plant – Retired HEPA Filter Passive Vent	Is deactivated and capped
7	296-B-10	Waste Encapsulation and Storage Facility	In compliance
8	296-B-28	244-BX Double-Contained Receiver Tank	To be deactivated/capped
9	296-C-5	244-CR Vault	To be deactivated/capped
10	296-C-6	241-C-106 Exhauster	In compliance/Inactive
11	296-H-212	Canister Storage Building	In compliance
12	296-K-142	Cold Vacuum Drying Facility	In compliance
13	296-P-16	241-C-105 and 106 Tanks Exhauster	Is deactivated and capped
14	296-P-32	244-AR Vault Activity Portable Exhauster	In compliance/Inactive
15	296-P-33	Rotary Mode Core Sampler Portable Exhauster	In compliance
16	296-P-34	Rotary Mode Core Sampler Portable Exhauster	In compliance
17	296-P-43	Salt Well Pumping Portable Exhauster	In compliance
18	296-P-44	Salt Well Pumping Portable Exhauster	In compliance
19	296-P-45	Salt Well Pumping Portable Exhauster	In compliance
20	296-P-47	Waste Retrieval Portable Exhauster	In compliance
21	296-S-22	244-S Double-Contained Receiver Tank	To be deactivated/capped
22	296-T-18	244-TX Double-Contained Receiver Tank	To be deactivated/capped
23	296-W-4	Waste Receiving and Processing Facility	In compliance
24	291-Z-1	Plutonium Finishing Plant Main Stack	In compliance
25	296-Z-7	Plutonium Finishing Plant 2736-ZB Building Exhaust	In compliance
26	340-NT-EX	340 Building Main Stack	In compliance/being downgraded
27	EP-324-01-S	324 Building Main Stack	In compliance
28	EP-327-01-S	327 Building Main Stack	In compliance

**Table 2. Status of FFCA Compliance Plan Milestones**

Stack Number	FFCA Compliance Plan Milestone	Description	Completed Y/N	Completion Date: Scheduled (Actual)
291-A-1	<b>PUREX Plant</b>			
	Appendix A I.1.a.	Certify flow meter in accordance with Title 40, Code of Federal Register (CFR) 52 Appendix E. Document certification and submit to EPA a request for approval of monitoring system. <i>(EPA accepted system as an alternative method.)</i>	Y	January 1, 1994 (April 1994)
291-Z-1	<b>PPF</b>			
	Appendix A I.2.a.	Complete a flow measurement site selection.	Y	May 30, 1994 (April 29, 1994)
	Appendix A I.2.b.	Complete flow measurement equipment upgrades <i>(Alternate method accepted by EPA, Headquarters)</i>	Y	May 30, 1996 (May 4, 1995)
	Appendix A I.2.c.	Document upgrades and submit to EPA a request for approval of monitoring system.	Y	July 31, 1996 (September 1995)
291-B-1	<b>B Plant</b>			
	Appendix A I.3.a.	Complete flow measurement study.	Y	February 28, 1994 (February 15, 1994)
	Appendix A I.3.b.	Document results of flow studies and submit to EPA a request for approval of monitoring system.	Y	April 30, 1994 (April 30, 1994) In compliance (June 1994)
	N/A	Shutdown of stack.	Y	August 31, 1998
291-T-1	<b>T Plant</b>			
	Appendix A I.4.a.	Submit results of nondestructive assay stack evaluation to EPA.	Y	November 30, 1993 (Nov. 30, 1993)
	Appendix A I.4.b.	Submit to EPA a request for approval of monitoring system.	Y	April 30, 1994 (see below)
	Appendix A IV.	Redesignated as a minor stack.	Y	(November 1993)
340-NT-EX	<b>340 Waste Handling Facility</b>			
	Appendix A I.5.a.	Accept bids and award contract for monitoring system upgrades.	Y	December 1993 (Nov. 18, 1993)
	Appendix A I.5.b.	Complete installation of monitoring system.	Y	December 1994 (Dec. 16, 1994)
	Appendix A I.5.c.	Submit to EPA a report documenting compliance and request for EPA approval of monitoring system.	Y	March 1995 (March 22, 1995)
296-A-22	<b>242-A Evaporator</b>			
	Appendix A I.6.a.	Document flow measurement modifications and submit to EPA a request for approval of monitoring system. <i>(Submitted and received approval of alternate measurement system)</i>	Y	January 1, 1994 (January 1994)
	Appendix A IV.	Redesignated as a minor stack.	Y	(December 18 1998)

Table 2. Status of FFCA Compliance Plan Milestones

Stack Number	FFCA Compliance Plan Milestone	Description	Completed Y/N	Completion Date: Scheduled (Actual)
296-A-40	241-AP Tank Farm Primary Exhaust			
	Appendix A I.7.a.	Submit to EPA a revised schedule for upgrade of stack. Upon agreement by EPA, this schedule shall become a part of the agreement.	Y	November 30, 1993 (shown in FFCA Appx C)
	Appendix A I.7.b.	Submit to EPA a report documenting monitoring system compliance and request for EPA approval of monitoring system.	Y	December 31, 1996 (see below)
	Appendix C	Functional requirement document (FRD) submitted to EPA, Region 10 for approval. (approved March 20, 1995)	Y	August 30, 1994 (August 4, 1994)
		Conceptual design document submitted to EPA by 60 days after approval of FRD.	Y	May 20, 1995 (April 12, 1995)
		Upgrade Installation completed. (Reassessed to Minor Stack and accepted by WDOH on September 11, 1996)	Y	December 31, 1996 (Sept. 11, 1996)
		Submit to EPA a report documenting compliance and request EPA approval of monitoring system.	Y	January 31, 1997 (Sept. 11 1996)
EP-324-01-S	324 Building Main Exhaust			
	Appendix A I.8.	Complete and document upgrade of stack sampling system to NESHAP compliant system.	Y	February 3, 1994 (February 3, 1994)
EP-325-01-S	325 Building Main Exhaust			
	Appendix A I.9.	Complete and document upgrade of stack sampling system to NESHAP compliant system.	Y	February 3, 1994 (February 3, 1994)
EP-327-01-S	327 Building Main Exhaust			
	Appendix A I.10.	Upgrade to NESHAP compliant stack sampling system has been completed. (December 1992) Documentation was provided to EPA, Region 10.	Y	February 3, 1994 (February 3, 1994)
EP-327-02-V	327 Building Decontamination Cell Exhaust			
	Appendix A I.11.	Upgrade to NESHAP compliant vent sampling system has been completed. (October 1992) Documentation was provided to EPA, Region 10.	Y	February 3, 1994 (February 3, 1994)
EP-3720-01-S	3720 Building Main Exhaust			
	Appendix A I.8.	Upgrade to NESHAP compliant stack sampling system has been completed. (December 1992) Documentation was provided to EPA, Region 10.	Y	February 3, 1994 (February 3, 1994)
296-A-17	241-AY /AZ Tank Farms Primary Exhaust			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		29 day extension granted by EPA, Region 10.	Y	January 29, 1998
		29 day extension granted by EPA, Region 10.	Y	February 28, 1998
		29 day extension granted by EPA, Region 10.	Y	March 29, 1998
		Stack shutdown and replaced with new unit 296-A-42.	Y	March 29, 1998 (March 20, 1998)

**Table 2. Status of FFCA Compliance Plan Milestones**

Stack Number	FFCA Compliance Plan Milestone	Description	Completed Y/N	Completion Date: Scheduled (Actual)
296-A-25	<b>244-A Lift Station Catch Tank</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Stack reassessment completed - the initial reassessment (1) showed the stack to be a non-designated stack. However, a further study reassessed this stack (2) as a designated stack.	Y	August 31, 1995 (1) August 17, 1995 (2) (January 16, 1996)
		Design requirement document provided to EPA.	Y	October 31, 1995 (October 19, 1995)
		Design requirement review.	Y	April 30, 1996 (March 15, 1996)
		Begin construction.	Y	June 30, 1999 (May 5, 1999)
		Finish construction.	N	December 31, 2005
		Provide documentation to EPA.	N	April 30, 2006
296-A-27	<b>241-AW Tank Farm Primary Exhaust</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Stack reassessment completed and in compliance.	Y	October 31, 1995 (August 17, 1995)
296-A-29	<b>241-AN Tank Farm Primary Exhaust</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Stack reassessment completed and in compliance.	Y	October 31, 1995 (August 17, 1995)
296-B-28	<b>244-BX DCRT</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Design requirement document provided to EPA.	Y	October 31, 1995 (October 19, 1995)
		Design requirement review.	Y	April 30, 1996 (March 15, 1996)
		Stack reassessment completed.	Y	February 28, 1999 (January 16, 1996)
		Begin construction.	Y	June 30, 1999 (May 12, 1999)
		Finish construction.	N	December 31, 2005
		Provide documentation to EPA.	N	April 30, 2006

**Table 2. Status of FFCA Compliance Plan Milestones**

Stack Number	FFCA Compliance Plan Milestone	Description	Completed Y/N	Completion Date: Scheduled (Actual)
296-C-5	<b>244-CR Vault</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Design requirement document provided to EPA.	Y	October 31, 1995 (October 19, 1995)
		Design requirement review.	Y	April 30, 1996 (March 15, 1996)
		Stack reassessment completed.	Y	December 31, 1999 (January 15, 1996)
		Begin construction.	Y	June 30, 1999 (May 26, 1999)
		Finish construction.	N	December 31, 2005
		Provide documentation to EPA.	N	April 30, 2006
296-P-16	<b>241-C-105 &amp; C-106 Tanks Exhauster</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Design requirement document provided to EPA.	Y	March 1, 1995 (February 24, 1995)
		Design requirement review.	Y	October 31, 1995 (October 19, 1995)
		Stack reassessment completed.	Y	February 28, 1999 (January 16, 1996)
		Begin construction.	Y	June 30, 1999 (June 1, 1999)
		Finish construction.	N	December 31, 2005
		Provide documentation to EPA.	N	April 30, 2006
296-P-23	<b>241-SY Tank Farm Primary Exhaust</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Stack reassessment completed and in compliance.	Y	August 31, 1995 (August 17, 1995)
296-P-26	<b>241-AY/AZ Tank Farms Primary Backup Exhauster</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	March 31, 1995 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		29 day extension granted by EPA, Region 10.	Y	January 29, 1998
		29 day extension granted by EPA, Region 10.	Y	February 28, 1998
		29 day extension granted by EPA, Region 10.	Y	March 28, 1998



Table 2. Status of FFCA Compliance Plan Milestones

Stack Number	FFCA Compliance Plan Milestone	Description	Completed Y/N	Completion Date: Scheduled (Actual)
		Stack shutdown and replacement with new unit 296-A-42.	Y	March 28, 1998 (March 20, 1998)
296-P-28	<b>241-SY Tank Farm Primary Backup Exhauster</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	March 31, 1995 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Stack reassessment completed and in compliance.	Y	August 31, 1995 (August 17, 1995)
296-S-15	<b>241-SX Tank Farm Exhauster</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	August 31, 1994 (August 4, 1994)
		Design requirement document provided to EPA.	Y	October 31, 1995 (October 19, 1995)
		Design requirement review.	Y	April 30, 1996 (March 15, 1996)
		Stack reassessment completed.	Y	January 31, 1996 (January 18, 1996)
		Accepted as minor by WDOH.		(Sept. 16, 1996)
296-S-22	<b>244-S DCRT</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Design requirement document provided to EPA.	Y	October 31, 1995 (October 19, 1995)
		Stack reassessment completed.	Y	January 31, 1996 (January 18, 1996)
		Design requirement review.	Y	April 30, 1996 (March 15, 1996)
		Begin construction.	Y	June 30, 1999 (May 21, 1999)
		Finish construction.	N	December 31, 2005
		Provide documentation to EPA.	N	April 30, 2006
296-T-18	<b>244-TX DCRT</b>			
	Appendix A II.2.	Submit to EPA, Region 10 a point-by-point comparison with 40 CFR 61.93 requirements.	Y	August 31, 1994 (August 4, 1994)
		Submit to EPA, Region 10 a schedule for upgrades.	Y	March 1, 1995 (February 24, 1995)
		Design requirements document provided to EPA.	Y	October 31, 1995 (October 19, 1995)
		Design requirements review.	Y	April 30, 1996 (March 15, 1996)

**Table 2. Status of FFCA Compliance Plan Milestones**

Stack Number	FFCA Compliance Plan Milestone	Description	Completed Y/N	Completion Date: Scheduled (Actual)
		Begin construction.	Y	June 30, 1999 (May 19, 1999)
		Finish construction.	N	December 31, 2005
		Provide documentation to EPA.	N	April 30, 2006